

## **AMI Metals UK Limited Tax Strategy**

### **About AMI Metals UK Limited**

AMI Metals UK Limited (AMI) is a subsidiary of Reliance Steel & Aluminum Company (RSAC). AMI provides our customers with a comprehensive range of aerospace metals, including aluminium, stainless, steel, titanium, nickel alloys, and common alloys. AMI has UK sites in Ellesmere Port and Milton Keynes, which are complemented by our global service centers in the USA, Belgium, France, and Turkey.

AMI service centers have state of the art processing equipment offering full or cut-to-size materials, with the further option of utilizing our centrally located in-house machining and water-jet cutting facilities for our customer's more complex items.

### **Risk Management and Governance Arrangements in Relation to UK Taxation**

AMI is committed to complying with all relevant legal and regulatory taxation requirements and tax governance procedures. All employees are aware of their roles and responsibilities within the business and whenever tax implications of a transaction are not clear, members of the team will escalate queries to those who are suitably qualified within the finance function. Where the tax treatment of a transaction remains unclear following this escalation process, AMI seeks external advice from specialist tax consultants to ensure compliance.

AMI's Corporate Controller is responsible for implementing our approach to tax and tax risk management. In particular, the Corporate Controller is responsible for ensuring that policies and procedures that support our approach are in place, maintained and used consistently across all of our locations.

AMI has developed an overarching tax control framework in response to its Senior Accounting Officer certification obligation. As a result, AMI has a real-time process in place for identifying and addressing any UK tax risks and consequently, building a plan as to how to address risks that have been identified.

### **The Level of Risk in Relation to UK Taxation That We Are Prepared to Accept**

AMI's Directors consider the company's attitudes towards UK tax to be risk averse. The company is subject to governance from the tax department of its parent company, Reliance Steel & Aluminum Co. (NYSE: RS), a US-listed entity.

AMI has historically sought external advice from tax risk specialists in order to ensure that we are adopting a best-practice approach to our tax risk obligations.

### **Our Attitude Towards Tax Planning (So Far as Affecting UK taxation)**

Transactions will not be led by a tax planning purpose. All tax decisions are made in response to commercial activity and tax is one of many factors taken into consideration when making such decisions.

AMI undertakes no specific planning in any area of taxation and takes professional advice to ensure compliance with all tax regulations. AMI is committed to making an economic contribution to society by paying all taxes in a timely manner.

### **Our Approach Towards Our Dealings with Taxing Authorities**

AMI has always maintained an open and honest relationship with HMRC and will continue to do so. AMI has, and will continue to aim to, proactively engage with HMRC to confirm the treatment of uncertain tax positions, particularly where the application of legislation is industry specific, as is the case with Customs Duty.

We seek to provide HMRC with information on a voluntary basis in addition to that provided under tax filing requirements, where it is understood that this will enable a more efficient administration of tax law.

This document is provided on behalf of the following qualifying entities in the group for the year ended 31 December 2019 pursuant to Paragraph 19(2) Schedule 19, Finance Act 2016 and is intended to comply with all other obligations within Schedule 19 Finance Act 2016:

AMI Metals UK Limited  
Reliance Metals UK Holding Limited

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